

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

ISABELLA SNEED,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO. 22-CV-00031-R
)	
(1) INDEPENDENT SCHOOL)	
DISTRICT NO. 16 OF PAYNE)	
COUNTY, OKLAHOMA, A/K/A)	
STILLWATER PUBLIC SCHOOL)	
DISTRICT, A/K/A STILLWATER)	
INDEPENDENT SCHOOL DISTRICT)	
NUMBER 16,)	
)	
Defendants.)	

DEPOSITION OF SHERAE LEJUNE
TAKEN ON BEHALF OF THE PLAINTIFF
IN STILLWATER, OKLAHOMA
ON MARCH 6, 2023

REPORTED BY DEBRA GARVER, CSR, RPR



1 Q. All right. So if we go down now, beginning of
2 this third and fourth paragraph, this is -- this is your
3 summary of what Isabella -- the information Isabella
4 provided during this forensic interview. Is that right?

5 A. Yes.

6 Q. Okay. And this first part, she's describing
7 sort of the background with this Morejon as her eighth
8 grade teacher, correct?

9 A. Yes.

10 Q. And just without reviewing this, do you
11 recall -- do you recall anything as you sit here today as
12 part of the interview when Isabella was talking about her
13 relationship with Mr. Morejon that concerned you?

14 And I'm talking about even before he starts
15 sending the messages, just their relationship as a
16 teacher to a student.

17 A. I thought it was borderline inappropriate.

18 Q. Okay. So one of the first things -- one of the
19 things I wanted to ask you about, it states he, meaning
20 Morejon, let her, meaning Isabella, get away with things
21 that she should not have.

22 And she mentions having her cell phone -- using
23 her cell phone in class, sleeping in class. He would
24 submit grades for work that she did not turn in, allowed
25 her to sit and sleep behind his desk.

1 Do you recall those?

2 A. Yes.

3 Q. And what, if any -- as an investigator who
4 specializes in sort of predatory behavior towards minors,
5 what, if any, concerns would you have about that kind of
6 treatment of Isabella by Morejon?

7 A. The concern would be he was grooming her.

8 Q. Okay. What do you mean by "grooming"?

9 A. Giving her special attention, trying to gain
10 her trust, grow a sort of relationship between the two
11 that is different than with other students.

12 Q. Is that type of grooming something that you
13 routinely see in these kinds of investigations?

14 A. This is the only student teacher investigation
15 that I've worked. But there are various different types
16 of grooming behaviors.

17 Q. What about just more generally with
18 investigations that you're involved in with someone
19 sexually preying on a minor? Do you generally see that
20 kind of grooming behavior?

21 A. Again, this is the only student teacher one,
22 so, like, the grades and staying -- giving them special
23 attention in class. The other types of grooming
24 behaviors I see involve maybe parents, stepparents,
25 family members with very young kids, so that would be

1 more grooming of toys, candy, staying up late, things
2 like that.

3 So this is a different type of grooming
4 behavior given the -- where this took place and the age
5 of the victim.

6 Q. But it's the same -- it's essentially the same
7 concept, correct?

8 A. Correct.

9 Q. And it's special attention for the purpose of
10 what?

11 A. Gaining trust, building a relationship.

12 Q. Okay. She also indicated -- Isabella -- that
13 she was the only one in the class that was allowed to do
14 those things. Do you recall that?

15 A. I don't, but if it's in here, I could find it.

16 Q. It's like a couple lines down there. It says
17 Isabella said she was the only one in the class he
18 allowed to do those things.

19 A. Okay. There were other people in the room
20 sometimes, but most of the time it was just Alberto.

21 Q. And, again, is that consistent with
22 grooming-type behavior?

23 MR. PRIDDY: Object to the form.

24 Q. (By Mr. Blakemore) Answer if you can.

25 A. Oh, I'm sorry. Could you repeat the question?

1 Q. Basically, what she's saying is that Morejon is
2 singling her out for this kind of special treatment in
3 the class, right?

4 A. Correct.

5 Q. And my question was: Is that consistent with
6 what you're trained to be grooming-type behavior?

7 A. It's consistent.

8 Q. All right. Down here a few more lines, it says
9 Isabella says he, meaning Alberto, would tell her not to
10 worry about turning anything in if she was having a bad
11 day and he would input the grade.

12 A. Correct?

13 Q. You see that?

14 A. Yes.

15 Q. Again, consistent with a grooming, correct?

16 A. Special attention, yes.

17 Q. All right. A few more sentences down here, it
18 indicates that Isabella said other teachers notice
19 Alberto's behavior as well. Do you see that?

20 A. Yes.

21 Q. And did you -- well, first of all, do you
22 recall -- do you recall Isabella saying that?

23 A. It's -- if it's in the forensic interview, I
24 mean, yes. Reading it here in the report right now, I
25 recall that.

1 then her mom coming to the police, right?

2 A. Yes.

3 Q. All right. In the next paragraph, Isabella and
4 her mother discuss reporting to the police because there
5 could be other girls he's talking to as well.

6 Did I read that correctly?

7 A. Yes.

8 Q. And, ultimately, you did find that there were
9 other -- at least one other victim?

10 A. Yes.

11 Q. Okay. And so we're now getting into, this next
12 paragraph, kind of how you conducted this investigation
13 specific to Isabella and Morejon.

14 Could you explain to the jury how you conducted
15 this part of the investigation?

16 A. I spoke with them about taking over the account
17 to chat with Morejon.

18 Q. And when you say "taking over the account,"
19 what do you mean?

20 A. From whatever point we decided to start, I
21 would be the one that would be in control of what
22 messages or images or videos -- any digital data that was
23 sent. No one else would have any input in it.

24 Q. Okay. And is that how, ultimately, this
25 investigation was conducted?

1 A. Yes.

2 Q. And had you done investigations similar to this
3 before?

4 A. Yes.

5 Q. And were you trained in how to conduct this
6 kind of investigation where you essentially take control
7 of someone's social media account or text messages?

8 A. Yes.

9 Q. And did you rely on that training and
10 experience in conducting this investigation into
11 Mr. Morejon?

12 A. Yes.

13 Q. All right. I just want you to -- mostly, I
14 just want you to identify these for the record.

15 There were actually two days that you -- you
16 did this aspect of the -- this part of the investigation,
17 right?

18 A. Yes.

19 Q. And the first day, I believe, was the 15th,
20 correct, May 15th?

21 A. Yes.

22 Q. And then the second day was May 19th; is that
23 right?

24 A. That would be correct.

25 Q. Okay.

1 MR. PRIDDY: Bob, just for the record, we're
2 talking about 2020, correct?

3 MR. BLAKEMORE: Yes.

4 MR. PRIDDY: Okay.

5 (Exhibit 2 identified.)

6 Q. (By Mr. Blakemore) All right. I'm marking this
7 as Exhibit 2.

8 Can you identify what I've marked as Exhibit 2
9 for the record?

10 A. This is a screen shot of Isabella's phone in a
11 conversation with a person identified as Alberto Morejon
12 within the app.

13 Q. Okay. And these were -- these images were part
14 of your investigative file, correct?

15 A. Yes.

16 Q. All right. So if you look at -- I'm going to
17 kind of look first at what you have in the report. And
18 you indicate -- and these are the -- this is the part of
19 the investigation.

20 On May 15th, 2020, you say that at the time you
21 begin documenting Alberto's responses with the digital
22 camera, however, you failed to document the messages sent
23 to him. Do you recall that?

24 A. Did I write that in here?

25 Is that what you're asking me?

1 Q. Yeah, you did write it. Do you recall that
2 though?

3 A. Oh, yes. Yes. Yeah.

4 Q. Was that just an error, that you didn't
5 document the messages sent to him, or was there a
6 particular reason that you did that?

7 A. That was my error.

8 Q. Okay.

9 A. It unfolded quickly, and if I had -- I should
10 have been taking screen shots of every single thing that
11 was sent and received and it slipped my mind or that was
12 my error.

13 Q. Okay. So these, I believe, are the ones on the
14 15th, and that's Exhibit 2.

15 And these are just -- these just represent
16 responses from Morejon's phone, right?

17 A. Yes.

18 Q. All right. So there's one here. So he -- so
19 that looks like it's 6/31, and that's page 18.

20 I'm on Exhibit 2, the pictures.

21 A. Okay.

22 Q. And it says -- well, at the top it says, Also
23 your mom has a house in Stillwater and Guthrie.

24 Do you know what that was in reference to?

25 A. I believe her mother was dating somebody in

1 Guthrie at that time. And her mom was in Guthrie, or
2 that's at least what we were saying.

3 Q. And then he says -- if you look down here, it
4 says, You're a virgin though, you ain't even ready.

5 Did I read that correctly?

6 A. Yes.

7 Q. And do you know what -- do you recall what that
8 was in response to?

9 A. I don't.

10 Q. But can we agree that whatever it was in
11 response to, that's not an appropriate thing for a
12 teacher to be texting to a minor student?

13 A. Yes.

14 Q. All right. If you look down -- I'm now back at
15 Exhibit 1, on your report, and I'm on page 8.

16 So there's a section there where you're kind of
17 quoting some of his messages from May 15th. And then if
18 you go down after that, in sort of the middle of the
19 page, it starts out, It was obvious.

20 Do you see that?

21 A. Yes.

22 Q. So you state, It was obvious that Alberto was
23 not going to meet.

24 And do you recall what that was in reference
25 to?

1 A. At that time we were intending on seeing if he
2 would meet -- I mean, obviously, we're talking about some
3 sexual behaviors that hasn't been -- and sex act that has
4 been identified.

5 But we were going to see if we could obtain
6 that to make it a criminal investigation and have him
7 meet this student in person, underage student. It was
8 clear he was staying in for the night, he wouldn't be
9 able to leave.

10 So if we kept pushing that, I think it would
11 have ruined this case, ruined that investigation. And I
12 think it would have bolstered it if we could pick up a
13 few days later and say, look, he's still continuing this
14 type of behavior.

15 Q. Did you ever get the impression that he was
16 beginning -- he was beginning to get a little suspicious
17 about some of the messages or?

18 A. No.

19 Q. Okay. But there was -- Isabella did say during
20 her interview that he would make sure that she erased all
21 the messages on her phone.

22 I mean, he was taking measures prior to this to
23 hide or cover up the behavior. Would you agree with
24 that?

25 A. Yes.

1 Q. Okay. So you say, this next sentence, To
2 protect the integrity of the case, I decided to end the
3 conversation with Alberto.

4 Is that sort of what you just testified to?

5 A. Yes.

6 Q. All right. So next paragraph, then, we're at
7 May 19th. And this is sort of the second round of the
8 same type of investigation with the direct messaging,
9 right?

10 A. Yes.

11 Q. But this time you took screen shots of both
12 ends of the messages; that is, from Isabella's phone and
13 the responses from Morejon, correct?

14 A. Correct.

15 Q. Okay. I'm going to mark this as Exhibit 3.
16 (Exhibit 3 identified.)

17 Q. (By Mr. Blakemore) And this is a pretty lengthy
18 document, but if you'd just take a second to look through
19 that.

20 A. I remember -- I don't remember all these, but,
21 yes, I remember this conversation.

22 Q. Okay. And are these -- and I'm talking about
23 Exhibit 3 that I've handed to you.

24 Are these screen shots that you took?

25 A. Yes. So I had a digital camera on a mount, and

1 I'd just slide the phone under and take the photo,
2 because these messages disappear.

3 Q. All right. So you indicate: It should be
4 noted that none of the images of Isabella were
5 provocative or suggestive in nature.

6 Why did you think it was important to note
7 that?

8 A. I don't want a jury or anyone else to look like
9 we were entrapping Morejon. In fact, at one point she
10 was wearing a police jacket. It was cold in there.

11 Q. They only show -- "they," meaning the images,
12 only showed enough of her face or upper body for Alberto
13 to identify her.

14 And that's important so he's -- obviously, that
15 he knows it's her and he's not going to be suspicious,
16 right?

17 A. Right. And it maintains how they normally
18 spoke by showing those same types of photos to each other
19 when they had conversations.

20 Q. Okay. All right. If you'd turn to page 10 of
21 your report. Can you just generally describe what this
22 is, what we're looking at on page 10?

23 A. This is just the conversations that take place
24 on these screen shots. It's just transcribed into my
25 report in order.

1 Q. And you might take a second to read through
2 this, but my question is: At what point -- and it goes
3 on to page 11.

4 But at what point during this process did you
5 believe that you had probable cause that a crime had been
6 committed?

7 A. Can I read through?

8 Q. Sure.

9 (Brief pause.)

10 THE WITNESS: So his intention with meeting
11 her, it's clear, you know, the risk; so suck his dick,
12 that's an identified sex act that would be happening if
13 they were to meet in person.

14 Q. (By Mr. Blakemore) Okay. And if you would,
15 just kind of read the rest of this. It goes on,
16 actually, to the middle of page 12. And just kind of let
17 me know each time you see something that you think is
18 criminal.

19 A. Oh, so start on page 10 and go through?

20 Q. Yeah, yeah, if you would.

21 That's the first one that you saw?

22 A. So this entire conversation would be -- just to
23 kind of wrap it up, you have to have an identified sex
24 act, that you are going to meet, and you have a place and
25 a time.

1 So he's talking about the risk to suck his
2 dick. She's talking about, I would feel comfortable with
3 you and give me some tips since you don't want to meet.

4 And he says, Why? Are you about to suck
5 someone's dick and you want to practice first?

6 Q. And how old is -- how old was Isabella at this
7 time?

8 A. Fourteen. That's from Gee's report.

9 Q. Okay. I want to ask you just for a second
10 specifically about one thing here. It's on page 10
11 towards the bottom.

12 He says, "I dare you to ask Avery Blakey for
13 advice and see what she says."

14 Did you have any appreciation for what that
15 meant?

16 A. It sounds like he has done something with or to
17 Avery Blakey.

18 Q. Do you know who Avery Blakey is?

19 A. Yes.

20 Q. Did you follow up on that information?

21 A. No.

22 Q. Okay. How is it that you knew who Avery Blakey
23 is?

24 A. I have -- she's part of some other
25 investigations having nothing to do with this.

1 Q. Oh, okay. Is there a reason why you didn't
2 follow up on that statement?

3 A. Unavailability on the victim's part.

4 Q. Okay. When you saw that statement, did you,
5 though, have a concern that there were potentially other
6 victims?

7 A. Yes.

8 Q. Okay. So I'm looking now at page 11, but
9 there's some other lewd language here that he's using in
10 connection with oral sex. And is that, again, additional
11 evidence of a crime?

12 A. Yes. He's using an electronic device to talk
13 about sex acts, yes, with a minor.

14 Q. All right. Towards the bottom of page 11, it's
15 the 6:22 p.m., and you're describing the photo, or the
16 screen shot view, of the lower portion of the same person
17 wearing the same clothes but with the front shorts pulled
18 down. He's holding his groin area over his underwear
19 outside of his shorts with his left hand.

20 And then it says, "Those aren't my shorts."
21 Did I read that correctly?

22 A. Yes.

23 Q. And is this one of the -- if you recall -- I'll
24 find it here.

25 Do you recall there being what we've talked

1 about before as being an imprint image?

2 A. Yes.

3 Q. All right. So I think if you turn to -- and
4 now I'm back at Exhibit 3. If you'd turn to page 65.

5 A. Mm-hmm.

6 Q. Is that the image that you're describing in the
7 report at 6:22 p.m.?

8 A. Yes.

9 Q. And would you describe this as a imprint image?

10 A. No.

11 Q. Okay. How would you describe this?

12 A. An imprint image would be like an erect penis
13 under tight-fitting clothing. This is him grabbing
14 himself.

15 Q. Okay. Is this legal behavior?

16 A. No.

17 Q. Okay. So page 65 of Exhibit 3, that would be
18 additional evidence of a crime?

19 A. Yes.

20 Q. By the way, we've been going for, like, an
21 hour. If you want to take a break --

22 A. No, I'm good.

23 Q. Okay. Next page, page 12 of your report, and
24 the first, like, full paragraph past the quotations from
25 the screen shots, you indicate that you requested

1 A. I can't -- without reading further, I can't
2 remember if it was a deleted account or if he had just
3 deleted those messages.

4 Q. Okay. If, in fact, he deleted those messages,
5 could that have been obstruction, potentially?

6 A. I've never thought of it that way. I mean, if
7 you wanted to stack charges, we could see if it meets the
8 elements.

9 Q. Okay. I was just curious.

10 All right. Next paragraph, this is where
11 you're describing -- it's May 22nd, 2020, and you
12 received a call from Alberto's step-father-in-law.

13 And that's Mr. Jared Brisbin, correct?

14 A. Yes.

15 Q. And did Brisbin -- had you attempted to contact
16 him or did he make first contact with you?

17 A. I think he called me first.

18 Q. And it indicates here that -- and, again, this
19 is a recorded call that's part of your investigative
20 file, correct?

21 A. Yes.

22 Q. Indicates that Brisbin said Alberto admitted to
23 him that he, quote, did it and told him that there were
24 other girls, but he does not think that they are known.

25 Did I read that correctly?

1 A. Yes.

2 Q. So we've got, you know, his statement about
3 Avery Blakey and now we've got the step-father-in-law
4 telling you that there are other girls.

5 So at this point what, if anything, are you
6 doing to follow up with respect to the other potential
7 victims?

8 A. So with Avery Blakey, it's reaching out to
9 parents saying, hey, we have this information. Whenever
10 we receive information from the other victim, I follow up
11 with that victim that you -- you can't just send out an
12 email to the schools saying, hey, this happened, talk to
13 your kids.

14 It's a very sensitive and vulnerable time for
15 victims to come forward, and when they're ready, they
16 will.

17 Q. And Blakey, I think what you're telling me is
18 that her parents said they didn't want --

19 A. I'm not going to talk about it.

20 Q. You can't talk about that.

21 But it didn't go anywhere?

22 A. No.

23 Q. Yeah. Okay. You also state in here Alberto
24 said he did act on one of the girls?

25 A. Yes.

1 picture messaging. I only took screen shots of the text
2 conversations that could be read.

3 Did I read that correctly?

4 A. Yes.

5 Q. Where are those -- where are those screen
6 shots?

7 A. I would assume they were submitted into
8 property.

9 Q. Okay.

10 A. If they were not made available, that was for
11 not any immoral reason.

12 Q. Okay. The last -- well, second to the last
13 paragraph, you indicate Alberto's phone was disconnected
14 from cellular and internet services upon its seizure and
15 you later placed the phone in a Faraday bag.

16 Is that -- is that still in evidence?

17 A. Yes.

18 Q. Okay. So after this arrest takes place, aside
19 from this Mr. Brisbin, were you contacted by anyone else
20 with respect to Morejon?

21 A. No.

22 Q. All right. So there was, though, a -- there
23 was, though, a second investigation, correct?

24 A. Yes. Now, that case I don't want talk about.
25 That's -- she can still come forward. I don't want

1 something to be -- to mess -- interfere with that
2 investigation at a later date, if that makes sense. And
3 she's still in communication with us.

4 Q. Oh, has there not been --

5 A. So, yeah, the statute of limitations is 40
6 years after the time that they disclose.

7 Q. Okay.

8 A. So she has been on the fence, which is totally
9 understandable, and it can take a lot of time for her to
10 talk. And that is a good case. I just want to respect
11 her -- her rights to wait.

12 Q. Okay.

13 A. And she's -- if you have that information, then
14 you have her --

15 Q. So, no charges have been filed yet?

16 A. No.

17 Q. And I'm not going to even -- I won't even use
18 her name.

19 A. Okay.

20 Q. I just want to ask you a couple general
21 questions.

22 A. Okay.

23 Q. There was a second victim?

24 A. Yes.

25 Q. And how did you learn about that?

1 A. I don't remember.

2 Q. Okay. The second victim was also a student of
3 Mr. Morejon at Stillwater Middle School, correct?

4 A. Correct.

5 Q. And were there similarities in what was
6 reported by the second victim and what you saw with
7 respect to Isabella?

8 A. Yes.

9 Q. And just as you sit here, what are some of
10 the -- what are some of the similarities?

11 Again, without using her name or -- but what
12 were some of the similar conduct between the two cases?

13 A. Meeting -- he talked about, with Isabella,
14 meeting at a neighbor's house that he was housesitting
15 for. And this other victim talked about that same thing,
16 that they had a place that they could go to for things to
17 happen. And just singling out within the schools, within
18 class, extra attention to her.

19 Q. The grooming type --

20 A. Yes.

21 Q. -- behavior?

22 A. Just gaining that trust. And she was -- she
23 was a vulnerable kid.

24 Q. And the second victim -- does the fact that
25 there are the similarities between the two cases and what

1 the second victim's reporting, does that, in your mind as
2 an investigator, make it more credible?

3 A. Yes.

4 Q. Okay. And, overall, do you find what the
5 second victim has told you about Mr. Morejon's behavior
6 to be credible?

7 A. Yes.

8 Q. But as it stands right now no charges have been
9 filed, and you attribute that to, again, the victim,
10 understandably, being concerned about going forward to
11 that extent. Is that right?

12 A. Correct. And Mr. Morejon is aware of the
13 second victim and the charges that can be brought forth,
14 and that there's many, many years that this could take
15 place. He is aware of that.

16 Q. Of course.

17 A. It's just whenever she's ready, if she's ever
18 ready.

19 Q. Okay. Has anybody else -- since this happened,
20 aside from this second victim, Brisbin, has anybody come
21 to you and asked -- or reported to you about any
22 additional inappropriate conduct by Morejon?

23 A. No.

24 Q. Has anyone from Stillwater Public Schools
25 contacted you about the investigation at any time?